

Housing Ombudsman Complaints Handling Code

Our self-assessment: December 2023

Section 1 - Definition of a complaint			
Mandatory 'must' requirements			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	The Complaints Policy includes this definition. This can be found in Section 2.1 of the Complaints Policy. https://www.octaviahousing.org.uk/assets/000/001/149/Complaints_Policy_v3_final_original.pdf?1664539470
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Section 2.2 and 2.5 of the Complaints Policy confirms these requirements. It explicitly highlights a third party, acting on behalf of a resident/customer will be accepted.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Section 4 of the Complaints Policy details when we will log a complaint at Stage 1.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	All complaints will be accepted unless the matter being raised is not covered under Octavia's Complaint Policy.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 2.4 of the Complaints Policy includes the circumstances in which a matter will not be considered under the complaints process.

1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	Where a request to use the complaint process is received, and the matter is not covered under the feedback and complaints policy (as explained in 1.8), Octavia will write to the customer clearly explaining why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.
Best practice ‘should’ requirements			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Section 4.1.1 of our Complaints Policy clearly sets out the differences between a service request and a complaint.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish.	Yes	<p>Our TSM surveys are carried out by an independent company. These will be predominantly done by telephone and some via email. The company’s interview scripts, and written text refer to our complaints process and how to make a complaint.</p> <p>Our transactional feedback surveys are hosted on MS Forms and include a statement about the Complaints process and how to make a complaint, which reads: <i>“If you are dissatisfied with the service provided by Octavia, we do have a complaints process that you can access by calling 020 8354 5500, emailing complaints@octavia.org.uk or by completing a form on our website. You can find the form and more information about the Complaints process at How to make a complaint (octaviahousing.org.uk)”</i></p>

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all the potential channels, there must be more than one route of access into the complaints system.	Yes	Section 3.1 of the Complaints Policy. Octavia provides several channels to a make a complaint, including in writing by letter, email or by digital form on website person, by telephone and in person.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	The complaints policy is available in a clear and accessible format on our website and in our reception area. How to make a complaint (octaviahousing.org.uk) See action point below in 2.4
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Information on the Complaints process and the Complaints policy can be found easily through the search facility of our website. Action: We are streamlining the number of pages we have, to make it easier for residents to access the information, ensure consistency and make the page more accessible for those with visual impairments.

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Section 8.0 of the Complaints Policy and our Translation, Interpretation and Reasonable Adjustments policy. Staff undertake annual Equality, Diversity and Inclusion Training as part of our Learning Management System. Action: A minor amendment will be made to the complaints policy to improve wording around this point.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	We publicise the Complaints Policy online on our website, in articles included the customer magazine 'Resident Update' and in our reception area outlining how customers can make a complaint. Action: We are making minor amendments to the policy to and procedure to reflect recent changes to our workforce and workflow processes. This will be completed end of February 2024.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We provide contact information for the Ombudsman in regular resident communication including response letters, newsletters and annual reports.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	This is detailed in relevant complaint template letters. Also, Section 3.7 of the Complaints Policy reads: "If at any point you are unhappy with how things are progressing, please let us know. You can contact the Housing Ombudsman Service at any point throughout your complaint for advice. The Housing Ombudsman's details are on page 6 of the document."

Best practice ‘should’ requirements			
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Section 3.4 of the Complaints Policy states: “If you raise your complaint via social media, we will reply and ask you to message us directly with further details so that we can log your complaint and maintain your privacy.”

Section 3 - Complaint handling personnel			
Mandatory ‘must’ requirements			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes	We have a dedicated Complaints Team, supported by a Senior leader. A report is published quarterly for Service Quality Committee, made up of board representatives. We also produce bi-annual reports to the Board. The Service Quality Committee receives regular performance updates from our Complaints team, who have responsibility for complaints handling and providing reports to our governing body.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Investigating Managers/Officers investigate all complaints on behalf of our customers. They are given full autonomy to investigate the complaint independently and offer resolutions and compensation as necessary and there are no conflicts of interest.

Best practice 'should' requirements			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly. • be trained to handle complaints and deal with distressed and upset residents. • have access to staff at all levels to facilitate quick resolution of complaints. • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Complaints handling was delivered following the launch of the Complaints Policy & Procedure, for all staff. Line Managers were expected to cover complaints handling with new starters as part of the new employee induction. Action: We are working with our Learning and Development Team to develop Complaints Handling Training - linking with dispute resolution principles of The Housing Ombudsman's Online Learning Portal.

Section 4 - Complaint handling principles			
Mandatory 'must' requirements			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations

4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	No	<p>Our complaints procedure has two stages only. We aim to acknowledge all complaints within 3 working days and aim to speak with residents at the early stages of the complaint investigations to resolve complaints. Our CRM system is used to manage complaints, provides audit trails and has capacity to store customer related documents, for ease of case management and retrieval. Following recent changes to workflow and our workforce arrangements; case management in accordance with our procedures has not always been consistent.</p> <p>Action: We recognise the need for CRM Super Users and CRM refresher training to ensure consistent use of the CRM system, timely completion of automated tasks including telephone calls with resident to reach agreements and case resolution to ensure full audit trails/records are stored within the CRM case management system. The identification of CRM Super Users is underway and CRM Refresher trainings for teams is being scoped. Both will be completed by end of financial year</p> <p>Additionally, with our L&D Team, we are also developing complaints handling/dispute resolutions training; with requirements for refresher training to occur on an annual basis. (See 3.3 above)</p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	<p>Our standard acknowledgement template letters contain relevant paragraphs to clarify understanding and outcomes. If any aspects are unclear, the Complaints Team will seek clarification to log the complaint accurately.</p> <p>We also have a Clarification of Issues form that can be issued to residents for this purpose.</p>
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We ensure that all complaints are investigated or responded to by a relevant staff member and that all investigations are done in an impartial manner.
	The complaint handler must: <ul style="list-style-type: none"> deal with complaints on their merits 	Yes	Our policy aligns with the Housing Ombudsman's Complaint Handling Code and dispute resolution principles. Staff have been trained to objectively review information and

4.7	<ul style="list-style-type: none"> act independently and have an open mind. take measures to address any actual or perceived conflict of interest. consider all information and evidence carefully. keep the complaint confidential as far as possible, with information only disclosed if necessary to thoroughly investigate the matter. 		<p>evidence provided, whether the facts of the case have been determined or not; with new staff members inducted by their managers.</p> <p>Action: We are working with Learning & Development Team to develop further training for all staff in disputes resolution and are developing mechanism to ensure this occurs on an annual basis.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is set out in our Translation, Interpretation and Reasonable Adjustments policy and procedure. Our CRM alerts also captures resident preferences around reasonable adjustments/arrangements, and these are used by staff in interactions with residents.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> set out their position. comment on any adverse findings before a final decision is made. 	Yes	<p>Complainants are given the opportunity to have their concerns heard as part of the case investigation.</p> <p>Similarly, as part of all complaint investigations, staff members who are subject are given the opportunity to comment on any adverse findings before a final decision is made.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is clearly set out in Section 4 of the Complaints Policy.
4.14	<p>A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action.</p> <p>Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint</p>	Yes	<p>Section 4.1.1 of the Complaints Policy sets out the circumstances in which a matter will not be considered.</p> <p>If we decide not to accept or escalate a complaint, we will give an explanation in accordance with our complaints policy. We will inform customers of their right to challenge this decision with the Housing Ombudsman Service (HOS) and we provide the contact details for the HOS.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.14	<p>A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action.</p> <p>Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint</p>	Yes	<p>Section 4.1.1 of the Complaints Policy sets out the circumstances in which a matter will not be considered.</p> <p>If we decide not to accept or escalate a complaint, we will give an explanation in accordance with our complaints policy. We will inform customers of their right to challenge this decision with the Housing Ombudsman Service (HOS) and we provide the contact details for the HOS.</p>
4.15	A full record must be kept of the complaint, any review, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	<p>We have full records of complaints.</p> <p>Action: Ass per 4.1 above - consistent use of the Customer Relationship Management (CRM) case management system is required to ensure all complaint correspondence and documents are logged and stored in one place.</p>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Octavia has an Unacceptable Behaviours policy, and this is used to manage unacceptable behaviours when managing complaints.

Section 4 - Complaint handling principles

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	No	<p>Our Complaints procedure requires the investigating Manager to telephone residents within 5 working days of complaint, both Stage 1 and Stage 2. which aims to allow staff to manage residents' expectations at an early stage and be clear with residents.</p> <p>Action:</p>

			As per 4.1 and 4.7, above the consistent use of CRM and dispute resolution refresher training will ensure this occurs more consistently.
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	No	Our aim is to resolve complaints at the earliest possible opportunity, in accordance with our Complaints Policy. Where evidence and outcomes needed to resolve matters are identified at an early stage, we will act quickly with resolutions and an apology offered immediately. Action: See 4.1 and 4.7 above highlights the plans improve our performance in resolving cases at the earliest opportunity.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	As per 1.3 above - this is set out in Section 2.5 of the Complaints Policy.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This is clearly set out in our Complaints policy and procedure.
4.9	Communication with the resident should not identify individual members of staff or contractors.	Yes	

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	No	Frequency of contact during the investigation should be agreed with the resident at each stage of the complaint. Action: As outlined in 4.1 above
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Stage 1 and Stage 2 resolution letters include a link to our Complaints Feedback Form.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	We recognise the impact that being complained about can have on future service delivery. Staff have opportunities to be supported during one-to-one meetings with line managers and to engage with any learnings that can be gained.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	This is set out in our Unacceptable Behaviour Policy

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	No	Section 4 of the Complaints Policy confirms our aims to respond to complaints within 10 working day. Action: We have identified improvements needed to achieve response times within 10 working days more consistently and will be working towards an action plan to achieve improvements from Mid-January 2024 onwards.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident	No	<p>Provision is made with our Complaints procedure to respond to complaints within a timely manner and to track any outstanding actions.</p> <p>Action: As part of our improvement action plan outlined in 5.1, we are putting in measures to ensure the tracking of outstanding actions to ensure they are both dealt with expeditiously and regular updates are provided to residents.</p>
5.6	Landlords must address all points raised in the complaint and provide obvious reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.	Yes	<p>This is included in the Complaints policy and procedure, our stage 1 response template and highlighted in training.</p> <p>Action: As part of an improvement action plan, this will be included in refresher training being developed with the Learning and Development team</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stages. • the decision on the complaint • the reasons for any decisions made. • the details of any remedy offered to put things right. • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer. 	Yes	This is part of the stage 1 response template and included in the Complaints procedure.

Stage 2			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	This is covered in Section 4.1.1 of the Complaints Policy
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Section 4.1.1 of the Complaints Policy and included in our complaint handling templates and procedure. We have a clarification of issue form that is provided to residents, in instances where any aspect of the complaint is unclear.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is detailed in the Complaints policy.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is detailed in the Complaints policy.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Each stage of an investigation is conducted independently by a different Investigating Manager at each stage.

5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Section 4 of the Complaints Policy confirms our aims to respond to complaints within 20 working days, and if agreed with residents any extended timescales. Action: We have identified improvements needed to consistently achieve response times and revised timeframes agreed with residents. We will be working towards an action plan to achieve improvements from January 2024 onwards.
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage. • The complaint definition • the decision on the complaint • the reasons for any decisions made. • the details of any remedy offered to put things right. • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three. • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	This is part of the stage 1 response template and included in the Complaints procedure.

Stage 3			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	Octavia has a two stage complaints process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stages. • the complaint definition • the decision on the complaint • the reasons for any decisions made. • the details of any remedy offered to put things right. • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	As above at 5.17

Section 5 - Complaint stages			
Best practice 'should' requirement			
Stage 1			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is outlined in Section 4.1.1 of our Complaints Policy. Any agreement to extend beyond our published timescales is first agreed with the customer.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We would always ensure that the customer is provided with the Housing Ombudsman's contact details so the customer can challenge our plans for responding and/or the proposed timeliness of the response. Contact details are provided to the customer at each stage of the complaint process.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Background information, including older reports, are considered during the complaint investigation to provide a fuller picture to help determine an outcome and resolution.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Any additional matters raised during the complaint investigation will be incorporated into the complaint (if relevant) and if the issue raised does not cause unreasonable delay to the complaint response. Any agreement to extend beyond our published timescales is first agreed with the customer.
Stage 2			
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is outlined in Section 4.1.1 of our Complaints Policy. Any agreement to extend beyond our published timescales is first agreed with the customer.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response ff the complaint being escalated.	Yes	We ensure that the customer is provided with the Ombudsman's contact details so the customer can challenge our plans for responding and/or the proposed timeliness of the response. Contact details are provided to the customer at each stage of the complaint process.
Stage 3			
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not have a 3 stage Complaints process.

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact.	N/A	We do not have a 3 stage Complaints process.
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Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	This is covered in Section 4 of the Complaints Policy Action: This will also be included in refresher complaint handling/dispute resolution training.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Octavia has a Compensation Policy and Procedure to ensure appropriate remedy for service failures

6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaint handling template response letters ensures remedy offers and remedial actions are clearly set out. Action: As part of the improvement plan, a tracker system will be developed to track remedial actions and ensure these are followed through to completion.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	This is set out in the Compensation Policy and Procedure.
Best practice ‘should’ requirements			
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents.	No	We are working towards a more systemic view of our complaints and using insight and data to improve processes and systems for the benefit of all residents.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	We consult with our legal representatives as and when required and within the context of complaint handling.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutiny panels.	No	No data on learning or improvements was included in our 2022/23 annual report. We will work with our Communications team to publish wider learning and improvements from complaints in our 2023/34 annual report and look for opportunities to report back on a quarterly basis to our resident, staff and the Residents Panel.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	<p>Section 6.1 of the Complaints Policy.</p> <p>Octavia's governance framework recognises that the Chair of the Services Quality Committee has lead oversight for complaints. They will receive regular information on complaints including insight into Octavia's complaint performance.</p> <p>Action: We have identified areas for improvement in providing more detailed insight on issues and trends arising from complaint handling.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s Orders. • Regular reviews of issues and trends arising from complaint handling. • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. • The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>As part of the governance and oversight of complaint handling, updates are shared quarterly with Quality Services Committee and bi-annually with Board.</p> <p>We capture complaint handling performance data within our monthly Balance Scorecard.</p> <p>The annual self-assessment is presented to Board each year clearly setting out our position against the Code and receives approval.</p> <p>Action: As outlined above we have identified areas for improvement in providing more detailed insight on issues and trends arising from complaint handling and with the tracking of management responses residual actions.</p>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	No	<p>This is currently done on an individual case by case level.</p> <p>Action: Whilst we do this on an individual level, we have identified areas for improvement in providing more detailed insight on issues and trends arising from complaint handling and using this to inform training for our staff and contractors.</p>

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. • take collective responsibility for any shortfalls identified through complaints rather than blaming others. • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	We have amended our job descriptions to include an objective around complaint handling and we are exploring our approach to engage with the professional standards set out by the Chartered Institute of Housing.
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	<p>We undertake a yearly self-assessment of our complaint handling process against the Housing Ombudsman complaint code, or sooner should the need arise, to gauge how we are performing.</p> <p>Publication of the review will be made available to our customers via our website:</p>
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This is included in our procedure in Section 6.1
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members. 	Yes	<p>The annual self-assessment is presented to Board and published via our website: https://www.octaviahousing.org.uk/for-tenants/feedback-and-general-information/complaints</p> <p>Our annual report also captures and publishes information on performance and</p>

	<ul style="list-style-type: none">• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents.• include the self-assessment in their annual report section on complaints handling performance		provides a link to the full assessment. This is published on our website and is also available on request.
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